UNITED STATES DISTRICT COURT EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 25-CR-20007

v.

HON. F. KAY BEHM

TERESA TRANTHAM,

Defendant.

DEFENDANT'S SENTENCING MEMORANDUM

NOW COMES the Defendant, TERESA TRANTHAM, by and through the Law Office of John Freeman, PLLC, and respectfully asks this Honorable Court to sentence Ms. Trantham to a non-custodial sentence. Such a sentence is sufficient but not greater than necessary to comply with the purposes of federal sentencing. *See* 18 USC § 3553(a).

TERESA'S BACKGROUND

Teresa is a 65-year-old lifetime resident of Michigan, and a mother of three adult children. Teresa was born and raised in Flint, Michigan by her parents until their divorce when she was 12-years-old. Following the divorce, Teresa was raised primarily by her mother, who she has always been extremely close with. Growing up, Teresa's sister suffered from a disability requiring significant care, but nonetheless Teresa had a good childhood where her needs were always met. Teresa maintained a good relationship with her father and was devastated when he passed away in June of 2024.

In 1979, Teresa married David Trantham and the pair ultimately divorced in 2001. While married Teresa gave birth to three daughters, and following the divorce Teresa was their primary caregiver. Despite the divorce, Teresa and her daughters moved in with David in 2015 after losing everything in a housefire. The pair and their daughters continue to reside as a family in Montrose, Michigan.

Sydney Trantham, Teresa's youngest daughter, is permanently disabled and she is dependent on Teresa. Sydney requires constant supervision for things like meal preparation, and transportation to appointments. Additionally, Teresa cares for her elderly mother who is in the early stages of dementia and requires supervision due to repeated instances of falling, ultimately resulting in injury.

Teresa earned her high school diploma from Flint Southwestern High School in 1978.

She attended the University of Michigan (Flint, MI), completing a total of 65 credits. Teresa was informed that a degree would not benefit her at her workplace, leading her to stop attending.

Over the course of her career, Teresa attended several different on the job trainings, and studied numerous topics relating to financial management, grant writing, and management/leadership skills.

THE OFFENSE

Teresa pled to Federal Program Theft, in violation of 18 U.S.C. § 666(a)(1)(A). Teresa is deeply remorseful for her actions, stating, "I ... accept responsibility for the charges filed against me. To say I am remorseful us an understatement. Unfortunately, what happened cannot be undone and I accept the consequences for my actions. I will strive to be better and make amends as I can."

SENTENCING

Ms. Trantham has paid the restitution amount owed and understands the gravity of her actions on the public trust. The defendant's sentencing guidelines are zero to six months. Ms. Trantham has no criminal history or substance abuse concerns. She is the primary caretaker of her 31-year-old daughter Sydney, and she cares for her elderly mother who is currently in the early stages of dementia. Teresa's daughter, Sydney, is dependent on her mother for basic life necessities and requires constant, continuous care. In addition, Ms. Trantham suffers from several physical health conditions including Type 2 diabetes, Crohn's disease, Severe Irritable Bowel Syndrome (IBS), and Arthritis in both hands. As a result of her physical health conditions Ms. Trantham is on several medications and regularly visits with her doctor to monitor her health issues.

Her offenses are a non-violent irregularity. Ms. Trantham maintained continuous employment throughout her adult life and has since retired. As stated in the Presentence Report, "a sentence other than a sentence of imprisonment, in accordance with USSG § 5C1.1(b) is generally appropriate." See USSG § 5C1.1, comment. (n.10). In a letter of recommendation from Brook Harley, she speaks on Teresa's daily care for both her mother and daughter, stating, "She takes on this responsibility with grace and patience, consistently putting their needs above her own. Her unwavering devotion to their well-being speaks volumes about her character and the depth of her kindness." Additionally, in a letter of recommendation from Cathy Hammond, Ms. Hammond states, "I would trust her to care for my son, which is one of the highest degrees of trust I can bestow on another person." Ms. Trantham is deeply remorseful for her actions and accepts full responsibility.

Respectfully Submitted,

s/John Freeman, P71450

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